UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

EPA Region 5 Records Ctr.

DATE: 1 3 OCT 1989

SUBJECT: Summary of Multi-Media Inspection Activities for

Rock Island Army Arsenal, June 19-22, 1989 (A53204:K4)

FROM: Gerald R. Golubski, Environmental Engineer

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TO: William D. Franz, Chief

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THRU: Willie H. Harris, Chief WHY

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BACKGROUND *

Rock Island Arsenal (RIA) is a manufacturing arsenal owned and operated by the U.S. Army. RIA's missions and functions include manufacturing, assembly, and support activities involving several military items such as gun mounts, recoil mechanisms, equilibrators, carriages, loaders, machine guns, grenade launchers, small arms, training devices, targets and related mobilization items. Wastes are generated from several operations including the following: electroplating, paint stripping, painting, cleaning/degreasing, vehicle maintenance, electrical maintenance, metal working, fueling operations, battery shop operations, and waste treatment sludges from painting and metal finishing. RIA initiated a program of recycling degreaser solvents in 1984.

* (obtained from RIA-Hazardous Waste Minimization Plan dated April 1987 page 1).

Summary of Findings

A. CAA

Particulate/VEO

Particulate emissions are controlled by a series of multicyclones at the facility's central coal fired power plant and by the newly installed baghouses (last year) at their new foundry building (222). At the time of the inspection, neither facility had any visible emissions although they were both operational.

2. Fugitive

Fugitive emissions were noted in recent years by U.S. EPA inspection teams. The outside coal storage yard was cited several years ago. However, at the time of the inspection, no fugitive emissions were noted.

3. SO_2 and NO_X

No SO_2 or NO_X emission problems were identified by either the Illinois EPA or by our own Agency.

4. VOC

The Facility has numerous paint spray booths, vapor degreasing units and various metal finishing tanks. Recent VOC calculations made by the facility indicate that they emit less than half the amount that their permit allows. It appears that paint booth filters are routinely changed, and degreasing tanks are kept closed. All operating permits were current for the vapor degreasers paint spray booths and for metal finishing operations.

5. NESHAPS

Asbestos has been identified in various buildings at the Arsenal. The Facility routinely subcontracts to licensed approved asbestos removal companies as required. However, at the time of this June multi-media inspection, no asbestos removal operations were being conducted.

B. CLEAN WATER ACT

Pretreatment

The facility does not have a direct discharge to navigable waters. Instead, the Arsenal's effluent is discharged from a pump house to the Rock Island Regional Treatment Plant. The effluent consists of waste waters from sanitary lines as well as from several pretreatment systems located at the Rock Island Arsenal (RIA).

In summary, the facility generally meets its pretreatment categorical limits as a metal finisher (as per 40 CFR 433.14). However, two exceedances were noted in 1989. Namely, the categorical limits for chrome were exceeded at Building 65 and 212 in February of this year. These excursions were explained by facility personnel who stated that irregular low flow pumping conditions caused less than optimal settling of heavy metals in their treatment tanks. The problem has already been corrected as explained by Dr. Shore, Environmental Coordinator at RIA. Further testing showed no other exceedances in recent months.

C. HAZARDOUS WASTES

RIA is licensed as both a generator and storer of RCRA regulated hazardous wastes. Only minor administrative notification deficiencies were noted and subsequently corrected at the time of the inspection. Facility keeps good operating logs, inspection reports, training records and completed manifests on file. No deficiencies were noted at the time of the inspection.

The facility does have a CERCLA site located along its river bank. Thus far, over 200,000 gallons of soils tainted with TCE have already been removed to a hazardous waste disposal site. Further, groundwater assessments have been planned by the Army this Fall. For the latest developments, please contact Dr. William Shore at (309) 782-7855. He will have the more recent analytical data as it is developed.

D. UNDERGROUND STORAGE TANKS (UST's)

The facility currently has one fifteen year old steel tank, and ten newer tanks that are only 2 to 4 years old. The newer tanks are made of fiberglass reinforced plastic that have either internal protection or are double walled. The facility has removed twelve of their old UST's within the last year. No deficiencies were noted at the time of this inspection.

E. FIFRA

Facility has three licensed applicators. No storage, packaging or application record deficiencies were noted.

F. TSCA

U.S. EPA-Region V TSCA inspectors completed a PCB inspection this FY. A copy of their inspection report can be obtained by notifying Ms. Phyllis Reed (5SPT).

G. WATER SUPPLY

No deficiencies noted. Facility has ample capacity and licensed operators. Drinking water quality is very good.

H. SPCC

Facility has not had any reportable quantity spills in recent years. Their new plan was certified in November 1987 by a Registered Professional Engineer.